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**VIA HAND DELIVERY**

Chief Judge Martin Glenn  
U.S. Bankruptcy Court, S.D.N.Y.  
One Bowling Green  
New York, NY 10004-1408

Re: In re: Frontier Communications Corp., No. 20-22476-mg

Dear Judge Glenn:

As directed by the Court during the discovery conference on October 15, 2024, Frontier is providing herewith for the Court's *in camera* review all legal hold memoranda issued by Frontier in connection with claims asserted by Movie Company Claimants (MCCs) and Record Company Claimants (RCCs). To correct my colloquy with the Court during the conference (on pp. 18-23), I must clarify that I was referring only to written legal hold memoranda, and I was not aware at the time of all of the memoranda that had been issued.

As also directed, because Frontier claims that the attorney-client privilege and work-product protection apply to these memoranda, we enclose a stand-alone privilege log, which we are providing to MCCs and RCCs by copy of this letter. The log includes two non-privileged attachments, which were previously produced to MCCs and RCCs. We included them on the log for completeness.

Frontier will submit a memorandum next week setting forth the basis for its claims, as the Court invited.

Respectfully submitted,

A handwritten signature in black ink that reads 'Jonathan B. Tropp'.

Jonathan B. Tropp

Enclosures: (1) Legal hold memoranda; (2) privilege log  
cc: All Counsel of Record (by e-mail, w/privilege log only)